

Martin B. Adelman
225 Broadway
New York, N.Y. 11201

March 1, 2012

Hon. Kiyo A. Matsumoto
United States District Judge
United States District Court
Eastern District of New York

Re: UNITED STATES v. RICHARD FUSCO
E.D.N.Y. Docket 11 Cr. 00030 (KAM)

Dear Judge Matsumoto,

I write to request an adjournment of the now-scheduled sentence date of March 26, 2012. This is the first such request.

I had sent for and received Mr. Fusco's medical records from the Federal Bureau of Prisons and nearly 1200 pages have arrived. He is a very ill man and I have to review and abstract these records as part of my sentencing presentation to your Honor.

Similarly, I am trying to set up an appointment to interview Mr. Fusco's primary care physician, arranging same has been difficult because of mutual heavy calendars.

In addition I will be filing a application for a departure or variance on what I will submit are compelling grounds.

I note this is the first request and that AUSA Elizabeth Geddes authorizes me to say that she does not oppose it.

So that I will not burden the Court with any further requests for adjournment, can I ask the Court to adjourn the sentencing for Mr. Fusco for 60 days.

Very truly yours,

_____/s/_____
MARTIN B. ADELMAN

cc: by ECF:
AUSA Elizabeth Geddes